

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 8:21CR264
)	
Plaintiff,)	
)	
vs.)	UNOPPOSED
)	MOTION TO CONTINUE
)	
ALFREDO ESCOBAR,)	
)	
Defendant.)	

COMES NOW the Defendant, Alfredo Escobar, through his counsel of record, in the above-captioned case respectfully moves this Honorable court to grant a 60-day continuance of the Defendant's Jury Trial scheduled for April 19, 2022 at 9:00 AM. In support of this motion, counsel states as follows:

1. That Defendant's counsel needs additional time to negotiate a resolution in the hopes of avoiding trial.
2. That Defendant's counsel hereby requests that trial in this case be continued to allow sufficient time for effective preparation and to further resolve this case.
3. Thus, the Defense counsel requests that this Honorable Court find good cause due to counsel's ongoing negotiations and grant a continuance of the trial.
4. That Defendant understands that the time for continuance granted will be deducted from his speedy trial time under 18 U.S.C. §3161 (h) (8) (A) & (B) and waives that right.
5. That Defense counsel has conferred with Government's counsel, Thomas Kangior, and determined that he is not opposed to a continuance of trial.
6. That Defense counsel in good faith believes that the Government will not be prejudiced if this continuance is granted.

WHEREFORE for all of the foregoing reasons, the Defense counsel moves for a 60-day continuance of Defendant's Jury Trial as set for April 19, 2022 at 9:00 AM.

DATED this 8th day of April 2022.

ALFREDO ESCOBAR, Defendant

By: /s/ Chinedu Igbokwe
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CERTIFICATE OF SERVICE

I, hereby certify that on this 8th day of April 2022 a true and correct copy of the foregoing document was served by electronic filing via CM/ECF, on all of the parties who are all CM/ECF filers and counsel is without knowledge of any unrepresented party or party who is not a CM/ECF filer involved in these proceedings.

/s/ Chinedu Igbokwe
Chinedu Igbokwe, Esq.